

Message

From: Glass, Geoffrey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1EE3C5CD15504E5AA8660FCF60D2E04D-GGLASS]
Sent: 3/2/2018 12:07:17 AM
To: Keith Hurley [keith@yrcaa.org]; hasan@yrcaa.org
Subject: Documents related to delegation
Attachments: ORCAA_Delegation Request_Parts 60 61 63_10072016.pdf; YRCAA NESHAP FRN 2001.pdf; WA DOE Standards 2016.xlsx

Keith and Hasan:

I have attached a couple of documents.

- ORCAA's delegation request, which includes their rules adopting part 60, 61, and 63 standards, exceptions, and limitations. They are requesting certain standards in parts 60 and 63 only when they apply to a title V source, in which case they are covered by title V fees. Note that ORCAA includes both NSPS and NESHAP request in a single letter, which is not what we want in future – including near future (present) – requests.
- The most recent Federal Register notice I have for YRCAA's delegations. I will keep my eyes open for something more recent.
- An Excel workbook that includes all part 60, 61, and 63 standards and which ones Ecology has requested in its delegation request.

If you have adopted 173-400, and base your delegation request on Ecology's adoption, your request cannot be more broad than Ecology's, but I suppose it could be less broad than Ecology's. For example, you could accept delegation for NSPS IIII and NSPS JJJJ only for title V source or only for permitted sources instead of taking delegation for all engines ... just a thought.

Geoffrey L. Glass, MSChE	US EPA Region 10
Environmental Engineer	1200 6 th Avenue, Suite 900
Stationary Source Unit	Seattle, WA 98101

206.553.1847 – glass.geoffrey@epa.gov